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1 experience that is associated with an expertise in
2 human factors. The precise expertise when you say
3 human factors expert is often related to how one
4 applies the scientific training one has received,
5 the experience that they have, and the education
6 that they've received.

7 Q. It's my understanding your role in
8 this case is as a human factor expert, correct?

9 A. Correct.

10 Q. Do you take a test that gives you a
11 certification that says I'm a humans factor
12 expert?

13 A. No, I haven't taken a test to -- to --
14 that -- that defines me as a human factors expert.
15 I received a Ph.D. in experimental and cognitive
16 psychology. I have applied this to -- to the
17 interactions that people have with products in
18 their environment over the course of a decade. I
19 have investigated this case and evaluated areas
20 that are relevant to my scientific discipline,
21 training and education, and have offered opinions
22 to accompany them.

23 Q. Are you licensed as a humans factor
24 expert?

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Exhibit 1